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*Attorneys for Jane Doe 1, individually*

*and on behalf of all other persons similarly situated*

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY**

JANE DOE 1, individually and on behalf of all  
other persons similarly situated,

Plaintiff,

vs.

BANC, JACK & JOE, LLC dba TITILATIONS  
GO-GO-BAR, BANC PERO, JOSPEH  
CARERI, JACK PERO, ABC COMPANIES 1-  
10 and JOHN DOES 1-10,

Defendants.

Civil Action No.: 2:17-cv-03843-KSH-CLW

**NOTICE OF MOTION FOR (1) CONDITIONAL COLLECTIVE ACTION  
CERTIFICATION; (2) COURT AUTHORIZED NOTICE; (3) PRODUCTION OF  
NAMES AND ADDRESSES PURSUANT TO 29 U.S.C. § 216(b); (4) CLASS  
CERTIFICATION PURSUANT TO FED. R. CIV. P. 23**

**TO: Pádraig P. Flanagan, Esq.  
Florio Perrucci Steinhardt and Fader, LLC  
235 Broubalow Way  
Phillipsburg, NJ 08865**

**PLEASE TAKE NOTICE** that on June 3, 2019 at 9:00 o'clock in the forenoon or as soon thereafter as counsel may be heard, the undersigned that Brach Eichler LLC, attorneys for Plaintiff Jane Doe 1, individually and on behalf of all other persons similarly situated, shall move before the Honorable Katharine S. Hayden, United States District Court for the District of New Jersey, for an Order: (1) certifying a collective class of Titilations Go-Go-Bar

employees/independent contractors who worked as exotic dancers during the relevant time period; (2) granting the issuance of Court-authorized notice to the conditional class members of the class; (3) compelling the production of names and addresses of such prospective members for the effective dissemination of notice as soon as possible; (4) certifying certify a class consisting of the following individuals pursuant to Rule 23(b)(3) of the Federal Rules of Civil Procedure:

All persons who, during the period of May 31, 2014 and continuing through the entry of judgment in this case, performed as an exotic dancer at Defendants' adult entertainment club in Bloomfield, New Jersey;

and (5) certifying certify a class consisting of the following individuals pursuant to Rule 23(b)(2) of the Federal Rules of Civil Procedure:

All persons who currently perform as an exotic dancers at Defendants' adult entertainment club in Bloomfield, New Jersey.

**PLEASE TAKE FURTHER NOTICE** that Plaintiff shall rely upon the Declarations of Jane Doe 1 and Lucas A. Markowitz, Esq., and a Memorandum of Law submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is attached.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Notice and Consent to Sue is attached.

Dated: April 29, 2019

/s/ Lucas A. Markowitz  
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